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BANK OF AMERICA, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,  
INC., et al.,

Defendants.

Case No.: 2:21-cv-00971-GMN-EJY

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 7] AND MOTION FOR FEES AND  
COSTS [ECF No. 8]**

**(Second Request)**

1 Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff Bank of  
2 America, N.A. (“BANA”) (collectively, the “Parties”), by and through their counsel of record,  
3 hereby stipulate and agree as follows:

- 4 1. On May 19, 2021, BANA filed its Complaint in the Second Judicial District Court,  
5 Case No. A-21-834935-C [ECF No. 1-1];
- 6 2. On May 20, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No.  
7 1];
- 8 3. On June 21, 2021, BANA filed a Motion for Remand [ECF No. 7] and Motion for  
9 Costs and Fees [ECF No. 8];
- 10 4. Chicago Title’s deadline to respond to BANA’s Motion for Remand and Motion for  
11 Costs and Fees was originally July 6, 2021;
- 12 5. On July 7, 2021, the Court granted the parties’ stipulation and order extending the  
13 deadline to respond to the Motion for Remand and Motion for Costs and Fees to  
14 August 5, 2021;
- 15 6. Chicago Title’s counsel is requesting an extension until September 7, 2021, to file its  
16 response to the pending Motion for Remand and Motion for Costs and Fees;
- 17 7. Chicago Title requests another extension of time to respond to the Motion for Remand  
18 and Motion for Costs and Fees to afford Chicago Title additional time to respond to  
19 the legal arguments set forth in BANA’s motions;
- 20 8. BANA does not oppose the requested extension;
- 21 9. This is the second request for an extension which is made in good faith and not for  
22 purposes of delay;

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1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to BANA's Motion for  
2 Remand [ECF No. 7] and Motion for Costs and Fees [ECF No. 8] is hereby extended through and  
3 including September 7, 2021.

4  
5 Dated: July 30, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: July 30, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY


14 Dated: July 30, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Darren T. Brenner  
16 DARREN T. BRENNER  
17 CHRISTINA V. MILLER  
18 Attorneys for Plaintiff BANK OF AMERICA,  
19 N.A.

20 **IT IS SO ORDERED.**

Dated this 2 day of August, 2021.

21  
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25 Gloria M. Navarro, District Judge  
26 United States District Court  
27

**CERTIFICATE OF SERVICE**

I hereby certify that on July 30, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

